

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUN 23 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment to the Commission's)
Regulatory Policies Governing)
Domestic Fixed Satellites and)
Separate International Satellite)
Systems)

IB Docket No. 95-41

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF COMSAT CORPORATION

COMSAT CORPORATION

Howard D. Polsky
Keith H. Fagan
Anna Lim

6560 Rock Spring Drive
Bethesda, MD 20817

June 23, 1995

No. of Copies rec'd
List ABCDE

015

SUMMARY

Nothing in the comments submitted by other parties refutes COMSAT's contention that the public interest will be served by allowing it to provide domestic and international service on the same basis as domsats and separate systems. It is beyond dispute that COMSAT should be allowed to provide one-stop shopping for its customers with mixed domestic and international needs. Moreover, COMSAT's INTELSAT capacity can help to a limited extent in alleviating the current domestic capacity shortage, thereby maintaining competitive prices.

The arguments advanced by some parties opposed to COMSAT's entry into the U.S. domestic market are unpersuasive. COMSAT has no privileges and immunities when acting as a U.S. common carrier in competition with other service providers. Moreover, COMSAT has no monopoly power in the market for international telecommunications services which it could leverage in the market for domestic services. As even PanAmSat admits in its comments, "[t]he market for international satellite services is highly competitive." Finally, there is no reason for the Commission to defer consideration of COMSAT's provision of domestic services until after INTELSAT is privatized. That suggestion is but a transparent attempt to put COMSAT at a competitive disadvantage in today's marketplace by making it the only U.S. satellite operator that would have to deny its customers the efficiency of one-stop shopping.

TABLE OF CONTENTS

	Page
COMSAT WORLD SYSTEMS.....	1
I. COMSAT'S ENTRY INTO THE U.S. DOMESTIC MARKET WILL SERVE THE PUBLIC INTEREST.....	3
II. THERE IS NO REASONED BASIS TO DELAY COMSAT'S ENTRY INTO THE U.S. DOMESTIC MARKET.....	7
III. SERVICE PROVIDERS THAT ACT AS COMMON CARRIERS SHOULD BE REGULATED AS COMMON CARRIERS.....	12
COMSAT MOBILE COMMUNICATIONS.....	13
COMSAT GENERAL CORPORATION.....	14
CONCLUSION.....	15

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JUN 23 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment to the Commission's)
Regulatory Policies Governing) IB Docket No. 95-41
Domestic Fixed Satellites and)
Separate International Satellite)
Systems)

REPLY COMMENTS OF COMSAT CORPORATION

COMSAT Corporation ("COMSAT") hereby submits these reply comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above proceeding.¹ In this reply, we first address issues relating to COMSAT World Systems, and then, briefly, issues relating to COMSAT Mobile Communications and COMSAT General Corporation.

COMSAT WORLD SYSTEMS

An overwhelming number of parties supported the Commission's initiative to eliminate the current distinction between its Transborder and Separate International Satellite Systems ("Separate Systems") policies, and to permit all U.S.-licensed fixed satellites to provide U.S. domestic and international services on a co-primary basis. However, a few commenters objected to including COMSAT in the Commission's new proposal.

¹ Notice of Proposed Rulemaking, FCC 95-146, released April 25, 1995.

In this regard, some pointed to COMSAT's "privileges and immunities" as U.S. Signatory to INTELSAT;² others asserted that COMSAT would cross-subsidize the sale of INTELSAT capacity for domestic service with international revenues because it is a "mega-monopolist" comparable to the old Bell System;³ and several urged the Commission to defer consideration of COMSAT's entry into the U.S. domestic market until INTELSAT privatization is completed.⁴

These concerns and recommendations reflect a fundamental misunderstanding, both as a matter of law and fact, of COMSAT's role as a common carrier under the Communications Satellite Act of 1962 ("Satellite Act"), and the position COMSAT occupies as a supplier of INTELSAT space segment capacity in the U.S. market for international telecommunications services. As demonstrated below, COMSAT has no privileges and immunities when it competes against separate satellite systems and fiber optic cables to carry transoceanic telecommunications traffic. Nor does COMSAT possess monopoly power or an attendant ability to engage in anticompetitive cross-subsidization. As COMSAT clearly demonstrated in its opening comments, there is strong competition

² AT&T at 13-14; GE Americom at 12-13; PanAmSat at 8; Orion at 4-5.

³ Orion at 5; Columbia at 9-10; PanAmSat at 8.

⁴ AT&T at 14; Capital Cities et al. at 17-19; GE Americom at 12-13; PanAmSat at 8; Orion at 5.

in the international telecommunications market.⁵ Indeed, PanAmSat flatly declared in its submission that "the market for international satellite services is highly competitive," and noted that international satellite services are currently being provided by numerous entities, listing INTELSAT as only one of many.⁶

There is also no reason for the Commission to defer COMSAT's participation in the domestic satellite service business until INTELSAT is privatized. That proposal is but a transparent attempt to ensure that COMSAT is put at a severe competitive disadvantage as the only U.S. satellite company unable to provide its customers with one-stop shopping for domestic and international services. No principled basis was advanced to support this suggested prejudicial treatment. Accordingly, COMSAT respectfully requests that it be given the opportunity, on a timely basis, to compete equally and fairly with all domestic and separate systems providers.

I. COMSAT'S ENTRY INTO THE U.S. DOMESTIC MARKET WILL SERVE THE PUBLIC INTEREST

As stated in its initial comments, COMSAT's primary reason for seeking to be included in the Commission's new policy is to be able to serve its customers with mixed domestic and

⁵ COMSAT at 9-11.

⁶ PanAmSat at 2.

international requirements.⁷ The public interest in this respect is beyond dispute. No commenter has explained why COMSAT's current or potential customers should be the only ones not entitled to take advantage of one-stop shopping and have their satellite communications needs met in the most efficient and cost-effective manner possible.

COMSAT also noted in its initial comments that INTELSAT's satellites are not ideally situated for the provision of purely domestic service in the U.S.⁸ However, COMSAT could help to a limited extent in alleviating the present domestic capacity shortage. As the Commission is aware, there is a severe shortage of C-band domestic capacity. The failure of AT&T's TELSTAR 402, and the retirement of four C-band satellites (ASC-1, GALAXY I, GALAXY II and TELSTAR 301) in 1994, has put substantial upward pressure on rates. The arrival of replacement satellites (GALAXY III-R and TELSTAR 402-R) is at least two years away, and even then the net loss of capacity will be 66 C-band transponders. Clearly, it is in the interest of consumers to make COMSAT's capacity available to help meet this shortage and maintain competitive prices.⁹

⁷ COMSAT at 3-6, 8-9.

⁸ Id. at 6-7. Unlike PanAmSat, COMSAT does not contend that it should be awarded slots in the U.S. domestic arc as part of the Commission's new policy. PanAmSat at 2,6.

⁹ COMSAT currently estimates that there are approximately 23 INTELSAT transponders, 18 C-band and 5 Ku-band, that could be made available for U.S. domestic use.

Columbia claims that the use of INTELSAT capacity to provide U.S. domestic service would be fundamentally inconsistent with INTELSAT's essential mission.¹⁰ To the contrary, allowing COMSAT to provide U.S. domestic service would not violate either the INTELSAT Agreement or the Satellite Act. The INTELSAT Agreement specifically states that "[t]he INTELSAT space segment established to meet the prime objective [i.e., international service] shall also be made available for other domestic public telecommunications services on a non-discriminatory basis to the extent that the ability of INTELSAT to achieve its prime objective is not impaired."¹¹ Likewise, the Satellite Act provides that "[i]t is not the intent of Congress by this Act to preclude the use of the [INTELSAT] communications satellite system for domestic communication services where consistent with the provision of this Act. . . ." Hence, Columbia's claim is legally deficient.¹²

HBO expresses the view that, because INTELSAT's capacity for occasional use television is often in short supply, it should not be diverted for domestic use.¹³ However, HBO cites no evidence

¹⁰ Columbia at 8-9. Columbia makes the same point with respect with INMARSAT.

¹¹ INTELSAT Agreement, Art. III(c).

¹² Satellite Act, § 102(d), 47 U.S.C. § 701(d). Indeed, as noted in our initial comments, COMSAT did provide U.S. domestic service via INTELSAT for some ten years before domsats became established. COMSAT at 4.

¹³ HBO at 14.

to support this assertion, and to the best of our knowledge, HBO's only problem in obtaining INTELSAT space segment capacity occurred in the Indian Ocean Region. Because of their orbital locations, INTELSAT satellites in this region cannot be seen from the U.S. Thus, their only use for U.S. customers is for double-hop international transmissions.

In any event, HBO's diversion argument is unfounded for two reasons. First, by reason of the INTELSAT Agreement and the Satellite Act, international telecommunications is, and will continue to be, COMSAT's and INTELSAT's main mission.¹⁴ Second, as a practical matter, the majority of INTELSAT capacity used for occasional use video is either on global beams -- which, of all the capacity on the INTELSAT system, is perhaps the least suited for U.S. domestic requirements -- or on other non-steerable C-band beams. Thus, COMSAT's entry into the U.S. domestic market will be limited at best and will not result in the diversion of scarce international capacity for domestic use.¹⁵

¹⁴ Satellite Act, § 102(a); INTELSAT Agreement, Art. III(a).

¹⁵ HBO also contends that, since U.S. domestic satellites are spaced two degrees apart, all other satellites must also observe this rule if they are to provide domestic service. HBO at 10-11. COMSAT submits that this is a non-issue as far as INTELSAT satellites are concerned. The INTELSAT satellite closest to the U.S. domestic arc is at 307°E (53°W), a full 16 degrees away from the nearest domestic satellite, GE Americom's SPACENET II, which is located at 291°E (69°W). Accordingly, INTELSAT satellites cannot possibly interfere with U.S. domestic satellites, or vice versa.

II. THERE IS NO REASONED BASIS TO DELAY COMSAT'S ENTRY INTO
THE U.S. DOMESTIC MARKET

The competitive analyses proffered by the parties opposed to COMSAT's entry¹⁶ are misplaced because of their obvious confusion over the distinctly separate roles played by COMSAT and INTELSAT. The issue here is not whether INTELSAT should provide U.S. domestic service, but whether COMSAT should be allowed to provide domestic as well as international services using INTELSAT capacity.

As the Commission is aware, INTELSAT and its 136 member nations and their designated Signatories collectively maintain and operate an international network of telecommunications satellites, TTC&M ground stations and other satellite support facilities. As an international treaty organization, INTELSAT has certain privileges and immunities. However, it is neither a common carrier, nor does it provide any telecommunications services directly to U.S. customers.

COMSAT, on the other hand, plays a dual role -- as the U.S. Signatory to INTELSAT and as a common carrier providing satellite space segment to U.S. customers. In its Signatory capacity, COMSAT's participation in INTELSAT is immune from antitrust liability. However, as a common carrier in competition with

¹⁶ See nn.2-4.

others, COMSAT has no such privileges and immunities.¹⁷ Furthermore, COMSAT is fully regulated by the Commission under Title II of the Communications Act; it must file tariffs and is obligated to serve all customers on a non-discriminatory basis. Thus, there is no factual or legal basis for the claim that COMSAT is seeking to enter the U.S. market as a "special treaty-exempt competitor."¹⁸

Nor does COMSAT's status as the sole provider of INTELSAT space segment capacity in the U.S. bestow upon it any special competitive advantage. That role merely gives COMSAT the right to market INTELSAT space segment capacity in the U.S., and does not preclude customers from obtaining space segment from any number of other suppliers, such as PanAmSat, Orion, Columbia, Hispasat, and U.S. domsats.¹⁹ As noted in The Brattle Group

¹⁷ The line between COMSAT's dual roles as Signatory and common carrier has been clearly drawn. Nearly four years ago, the United States Court of Appeals for the Second Circuit ruled that COMSAT's privileges and immunities extend only to its Signatory functions, and that COMSAT is not immune from antitrust liability when it competes for customers as a common carrier. Alpha Lyracom Space Comm. v. Communications Satellite Corp., 946 F.2d 168 (2d Cir. 1991), cert. denied, 502 U.S. 1096 (1992).

¹⁸ Orion at 5.

¹⁹ Furthermore, Article XIV(d) is not an impediment to competition, as AT&T asserts in its comments. AT&T at 13. The INTELSAT Assembly of Parties has determined that separate systems can now provide up to 8000 interconnected circuits per satellite and an unlimited number of non-interconnected circuits without causing significant economic harm to INTELSAT. As the Notice points out, the 8000-circuit threshold will allow virtually all of a satellite's capacity to be used for switched services. NPRM at 10, 12-13.

Study incorporated by reference in our initial comments, "while COMSAT possesses a legal monopoly on access to the INTELSAT system in the United States, that franchise no longer confers upon COMSAT any market power."²⁰ Moreover, since the NPRM proposes to allow the large U.S. domsat operators (GE Americom, Hughes and AT&T) to enter the international market, any possible competitive concerns involving COMSAT seem remote at best.

Conversely, COMSAT's entry into the domestic market does not pose any threat to U.S. domestic operators. Because of the orbital locations of the INTELSAT satellites, COMSAT will not be able to provide full-CONUS coverage.²¹ Therefore, all COMSAT seeks is the ability to provide its customers with the convenience of one-stop shopping for both domestic and international services -- in particular with respect to "mixed" services, where the domestic coverage is part of an integrated domestic/international service offering.

In its comments, Columbia refers to COMSAT as a "mega-monopolist," compares it with the old Bell System, and urges that COMSAT not be allowed to sell INTELSAT space segment for U.S. domestic use.²² This comparison is grossly inaccurate. Unlike the old Bell System, COMSAT has no monopoly power in one market

²⁰ Brattle Group Study at 3.

²¹ Two locations (307°E and 310°E) do provide near-CONUS coverage, excluding parts of the Pacific Northwest. COMSAT at 6.

²² Columbia at 9.

which can be used to disadvantage others in an adjacent, competitive market. COMSAT merely offers space segment capacity in competition with numerous other space segment suppliers. Thus, the analogy to the inherent structural problems of the old Bell System -- which combined local monopoly with a competitive long distance enterprise -- simply does not hold. Moreover, in terms of sheer size, AT&T dwarfs COMSAT. For example, the post-divestiture AT&T has total revenues exceeding \$75 billion, compared with COMSAT's revenues of \$827 million in 1994.²³ Plainly, COMSAT does not have the size or market power of AT&T.

Along the same lines, a few parties contend that, if permitted to go into the domestic market, COMSAT would be able to cross-subsidize its domestic offerings.²⁴ Yet it is rudimentary that there is no opportunity to cross-subsidize goods and services in a secondary market from revenues obtained in a primary market if effective competition already exists in the primary market. Faced with effective competition from its intramodal and intermodal competitors, COMSAT simply has no power or ability to set prices that others must follow in order to underwrite competitive services.²⁵

²³ See AT&T and COMSAT's 1994 Annual Reports.

²⁴ Orion at 5; PanAmSat at 8; Columbia at 9.

²⁵ Cf. Jefferson Parish Hospital District v. Hyde, 466 U.S. 2 (1984); Town Sound and Custom Tops, Inc. v. Chrysler Motors Corp., 959 F.2d 468 (3d Cir.), cert. den., 113 S.Ct. 196 (1992).

Some parties argue that it would be best to wait until INTELSAT has been fully privatized and restructured before COMSAT is allowed to offer domestic service.²⁶ COMSAT submits that such "competitive restructuring" of INTELSAT should not be a pre-condition for allowing COMSAT to provide domestic services. As is well known to all who are following this issue, privatization is a monumental task which will take some years to implement. Linking the privatization or restructuring of INTELSAT with COMSAT's provision of domestic service is nothing more than an attempt to delay COMSAT's entry into the domestic market, and the Commission should reject it, as it is not in the best interest of U.S. consumers.²⁷

Finally, the foreign entry and reciprocity issues raised by some parties have no bearing on COMSAT's request because, once again, it is COMSAT, not INTELSAT, that will be providing satellite service in the U.S.²⁸ Requiring every nation in the world to liberalize and open its markets to the U.S. as a condition precedent for COMSAT to compete in its own country is

²⁶ AT&T at 14; Capital Cities et al. at 18-19; PanAmSat at 8. TRW made similar comments with respect to INMARSAT. TRW at 2-3.

²⁷ Obviously, the Commission cannot meaningfully address the issues related to whether, or under what conditions, a privatized INTELSAT (or INTELSAT subsidiary) could offer domestic service in the U.S. until the privatization process is completed and a final INTELSAT structure is approved. However, that has nothing to do with COMSAT's current request.

²⁸ AT&T at 15-18.

simply not warranted, and the Commission therefore should reject this argument.

III. SERVICE PROVIDERS THAT ACT AS COMMON CARRIERS SHOULD BE REGULATED AS COMMON CARRIERS

The Commission's proposal to allow satellite operators to "elect" whether or not to be classified as common carriers attracted considerable attention from the commenters.²⁹ Some parties agreed with the Commission's proposal, while others maintained that they should not be regulated at all, regardless of the manner in which they provide their services. In COMSAT's view, these comments miss the point. The only thing for the Commission to determine in this regard is how service providers behave. Once that is known, the question of regulatory classification answers itself, as a matter of law.³⁰

As COMSAT pointed out in its initial comments, separate systems today do not limit themselves to offering "customized services" or to the sale or long-term lease of transponders as originally contemplated. Rather, they offer a full range of voice, data, and video services, and clearly hold themselves out for profit to the public at large. In sum, separate systems act like common carriers in every respect -- yet they do not file

²⁹ AT&T at 10-13; Hughes at 17-19; Orion at 9-10; PanAmSat at 8-9.

³⁰ See, e.g., Southwestern Bell Tel. Co. v. FCC, 19 F.3d 1475, 1481 (D.C. Cir. 1994); NorLight, 2 FCC Rcd 132, 135 (1987).

tariffs and reserve the right to discriminate in their prices and terms of service. This situation stands the law of common carriage on its head, and should be rectified as part of this proceeding.

COMSAT MOBILE COMMUNICATIONS

Several parties touched briefly on whether COMSAT Mobile Communications (CMC) should be allowed to provide both international and domestic services via INMARSAT, but most agreed that this issue could be dealt with in other proceedings. Only one party, Constellation Communications, raised any objections to COMSAT's provision of domestic MSS in its comments in this proceeding.³¹ Rockwell International supported the policy of fair and fully competitive worldwide markets and stated that, with proper competitive safeguards, "INMARSAT should be able to participate in all markets."³² IDB Mobile agreed with COMSAT that this issue should be decided in the context of the two recent applications filed by CMC and AMSC Subsidiary Corporation (AMSC).³³ And Motorola and TRW stated that mobile satellite issues should be addressed in other proceedings.³⁴

³¹ Constellation at 1-6.

³² Rockwell International at 3.

³³ IDB Mobile at 1-2.

³⁴ Motorola at 1-3; TRW at 1-2.

Based on these comments, COMSAT again submits that, while the public policy goals identified in this proceeding will clearly be met if CMC is allowed to provide both international and domestic services, this issue would be better addressed in ruling on the two pending applications of CMC and AMSC. A prompt decision on these applications will not prejudice the outcome of this proceeding in any way. Therefore, COMSAT again urges the Commission to act swiftly -- and concurrently -- on these two applications.

COMSAT GENERAL CORPORATION

Columbia notes that COMSAT is currently providing domestic service using non-INTELSAT space stations.³⁵ While it is true that COMSAT General (COMGEN), another line of business of COMSAT Corporation (and one structurally separated from COMSAT World Systems), is presently providing limited U.S. domestic service, that service will end soon. By January 1, 1997, the only C-band domestic in-orbit satellite licensed to COMGEN, the COMSTAR D-4, will be approximately 17 years old and will be operating at a very high inclination angle.

At present, COMGEN is the licensee of the SBS-2 satellite which was launched in 1981. The SBS-2 has a present inclination angle in excess of 6 degrees and will be de-orbited in December

³⁵ Columbia at 9.

1996 using the last remaining on-board fuel. Each of the eight operational transponders in SBS-2 has already been committed to provide service for the NBC network for the remainder of the satellite's useful life in orbit. Hence, even though COMGEN is currently providing a small amount of domestic capacity to U.S. customers, it does not use INTELSAT space segment for this purpose, and its status is therefore not germane to the policy considerations raised by COMSAT in this proceeding.

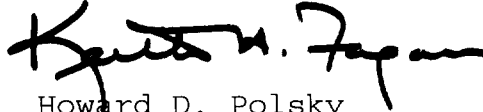
CONCLUSION

The public interest will clearly be served if COMSAT is allowed to compete fairly and fully with domestic satellites and separate systems. Those parties opposing COMSAT have not shown that COMSAT's entry into the market for U.S. domestic satellite services would harm competition in any way. To the contrary, the record plainly demonstrates that COMSAT's entry would increase competition and serve the needs of consumers. Accordingly, the Commission's proposed new policy should be extended, and COMSAT should be allowed to use INTELSAT capacity to provide both

domestic and international fixed satellite services on a co-primary basis.

Respectfully submitted,

COMSAT CORPORATION

A handwritten signature in black ink, appearing to read "Keith H. Fagan".

Howard D. Polsky
Keith H. Fagan
Anna Lim

Its Attorneys

6560 Rock Spring Drive
Bethesda, Md. 20817
(301) 214-3000

June 23, 1995

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments of COMSAT Corporation was served this 23rd day of June, 1995, by first-class mail, postage prepaid, on the parties listed below:

Mr. William F. Caton*
Acting Secretary
Federal Communications
Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Ms. Kathleen Wallman*
Chief
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Scott Blake Harris, Esq.*
Chief, International Bureau
Federal Communications
Commission
2000 M Street, N.W., Room 800
Washington, D.C. 20554

Mr. James L. Ball*
Associate Chief for Policy
International Bureau
Federal Communications
Commission
2000 M Street, N.W., Room 800
Washington, D.C. 20554

Mr. John M. Coles*
International Bureau
Federal Communications
Commission
2000 M Street, N.W., Room 514
Washington, D.C. 20544

Ms. Diane Cornell*
Federal Communications
Commission
2000 M Street, N.W., Room 838
Washington, D.C. 20554

Mark C. Rosenblum, Esq.
Peter H. Jacoby, Esq.
Judy Sello, Esq.
AT&T Corporation
Room 3244J1
295 North Maple Avenue
Basking Ridge, N.J. 07920

Randolph J. May, Esq.
Timothy J. Cooney, Esq.
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Mr. Kenneth Gross
General Counsel
Columbia Communications Corp.
7200 Wisconsin Avenue
Suite 701
Bethesda, Maryland 20814

Richard H. Shay, Esq.
April McClain-Delaney, Esq.
Orion Network Systems, Inc.
2440 Research Boulevard
Suite 400
Rockville, Maryland 20850

Mr. James T. Roche
Regulatory Counsel
Keystone Communications
Corporation
Suite 880
400 North Capitol Street, N.W.
Washington, D.C. 20001

Veronica M. Ahern, Esq.
Nixon Hargrave Devans & Doyle
One Thomas Circle
Washington, D.C. 20005

*Hand Delivered

Mr. Robert S. Koppel
Vice President, International
Regulatory Affairs
Worldcom, Inc.
15245 Shady Grove Road
Suite 460
Rockville, Maryland 20850

Henry Goldberg, Esq.
Joseph A. Godles, Esq.
Daniel S. Goldberg, Esq.
Goldberg, Godles, Wiener
& Wright
1229 Nineteenth Street, N.W.
Washington, D.C. 20036

Benjamin J. Griffin, Esq.
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Philip V. Otero, Esq.
Alexander P. Humphrey, Esq.
GE American Communications,
Inc.
1750 Old Meadow Road
McLean, Virginia 22102

Gary M. Epstein, Esq.
John P. Janka, Esq.
David M. Leive, Esq.
Teresa D. Baer, Esq.
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Ms. Kathy L. Shobert
Director, Federal Affairs
General Communication, Inc.
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005

Norman P. Leventhal, Esq.
Raul R. Rodriguez, Esq.
Stephen D. Baruch, Esq.
Walter P. Jacob, Esq.
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006

Ms. Linda C. Sadler
Manager, Governmental
Affairs
Rockwell International
Suite 1200
1745 Jefferson Davis Highway
Arlington, Virginia 22202

Cheryl A. Tritt, Esq.
Eric N. Richardson, Esq.
Morrison & Foerster
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

James M. Tobin, Esq.
Morrison & Foerster
345 California Street
San Francisco, CA 94104

Catherine Wang, Esq.
Margaret M. Charles, Esq.
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Charles M. Oliver, Esq.
Cohn and Marks
Suite 600
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036

Michael D. Berg, Esq.
Sari Zimmerman, Esq.
Verner, Liipfert, Bernhard,
McPherson and Hand
901 15th Street, N.W.
Washington, D.C. 20005-2301

James U. Troup, Esq.
Gerald Stevens-Kittner
Arter & Hadden
1801 K Street, N.W.
Suite 400k
Washington, D.C. 20006

Michael L. Glaser, Esq.
K. Harsha Krishnan, Esq.
Hopper and Kanouff, P.C.
1610 Wynkoop Street
Suite 200
Denver, Colorado 80202

William L. Fishman, Esq.
Sullivan & Worcester
1025 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036

John T. Scott, III, Esq.
William D. Wallace, Esq.
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2505

Leslie A. Taylor, Esq.
Leslie Taylor Associates
6800 Carlynn Court
Bethesda, Maryland 20817-4302

Howard M. Liberman, Esq.
Arter & Hadden
1801 K Street, N.W.
Suite 400K
Washington, D.C. 20006

Richard E. Wiley, Esq.
Michael Yourshaw, Esq.
Carl R. Frank, Esq.
Stephen J. Rosen, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Carlos Mier Y Teran Ordiales
Director General
Telecomunicaciones De Mexico
1200 19th Street, N.W.
Suite 607
Washington, D.C. 20036


James H. Barker, Esq.
Latham & Watkins
Suite 1300
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Ramsey L. Woodworth, Esq.
Robert M. Gurss
Wilkes, Artis, Hedrick &
Lane, Chartered
1666 K Street, N.W.
Suite 1100
Washington, D.C. 20006

Robert A. Mazer, Esq.
Jerold L. Jacobs, Esq.
Rosenman & Colin
1300 19th Street, N.W.
Suite 200
Washington, D.C. 20005

Stefan M. Lopatkiewicz, Esq.
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

International Transcription
Service*
2100 M Street, N.W.
Room 140
Washington, D.C. 20037


Claudette Womack

*Hand Delivered